

THE HONORABLE JOHN H. CHUN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

AGATA DROZDZ, an individual and TEAKRE  
VEST, an individual

Plaintiffs,

v.

USAA GENERAL INDEMNITY COMPANY,  
UNITED SERVICES AUTOMOBILE  
ASSOCIATION and USAA CASUALTY  
INSURANCE COMPANY,

Defendants.

Case No. 2:20-cv-01010-JHC

**CLASS ACTION**

**STIPULATED MOTION AND ORDER TO  
STAY CASE SCHEDULE DEADLINES**

**NOTED FOR CONSIDERATION:  
JANUARY 31, 2023**

Plaintiffs Agata Drozdz and Teakre Vest and Defendants USAA General Indemnity Company, United Services Automobile Association, and USAA Casualty Insurance Company jointly move this Court to stay all case schedule deadlines for 30 days so that the parties may engage in settlement talks.

**I. STIPULATION**

Pursuant to LCR 7(d)(1), LCR 10(g), and LCR 16(b)(6), the parties respectfully submit this stipulated motion to stay all case schedule deadlines for 30 days. In support of the motion, the parties state as follows:

1. Plaintiffs filed this proposed class action in King County Superior Court on March 5, 2020. *See* Dkt. No. 1-2. Defendants removed the case to this Court on June 29, 2020. *See* Dkt. No. 1.

STIPULATED MOTION AND ORDER TO  
STAY CASE DEADLINES - 1 Case No.  
2:20-cv-01010-JHC

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2. Over the past two and a half years, the parties have engaged in extensive discovery, including the production and review of thousands of pages of documents and millions of rows of data and the taking of several depositions.

3. This process has allowed the parties to assess the strengths and weaknesses of their claims and defenses.

4. The parties have agreed to engage in settlement talks to see whether this case can be resolved without further litigation.

5. Plaintiffs' motion for class certification is currently due on February 10, 2023.

6. The parties agree that it would be better to focus their time and energy on settlement talks rather than the work necessary to brief issues of class certification.

7. The parties expect that they can complete settlement talks within the next few weeks.

8. Based on the foregoing information, the parties agree that good cause exists to stay all case schedule deadlines for 30 days so that the parties may engage in settlement talks.

STIPULATED TO AND DATED this 31st day of January, 2023.

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II. ORDER

IT IS SO ORDERED.

DATED this 1st day of February, 2023.



THE HONORABLE JOHN H. CHUN  
United States District Judge